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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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U.S. DISTRICT COURT

THE MAGNAVOX COMPANY, ET AL.,)
)
Plaintiffs,)
)
v.)
)
CHICAGO DYNAMIC INDUSTRIES,)
INC., ET AL.,)
)
Defendants.)

CONSOLIDATED CIVIL ACTIONS

No. 74 C 1030

No. 74 C 2510 ✓

DEFENDANTS', THE SEEBURG COMPANIES,
INTERROGATORIES TO PLAINTIFFS NOS. 15-18

Defendants, The Seeburg Corporation of Delaware and Williams Electronics, Inc., hereby propound Interrogatories Nos. 15-18 to the plaintiffs, The Magnavox Company and Sanders Associates, Inc., to be answered in accordance with Rule 33 of the Federal Rules of Civil Procedure fully and separately in writing and under oath by officers or agents thereof competent to testify in their behalf.

The definitions set forth in earlier interrogatories propounded by these defendants are hereby incorporated by reference.

INTERROGATORY NO. 15 (a). State whether or not any company, organization or individual has ever requested any kind

of license under the patents in suit, or any other patents pertaining to video games owned by one of the plaintiffs, or under which the plaintiffs or one of them has the right to grant sublicenses, and the plaintiffs or one of them has refused to grant such a license.

(b). Unless the answer to Interrogatory 15(a) is unequivocally negative, supply the following information about each such event:

- (i) name and address;
- (ii) the dates of such request and its refusal;
- (iii) the patents under which licenses were sought;
- (iv) the reason or reasons for the refusal;
- (v) identify all persons known to plaintiffs to have knowledge of the events; and
- (vi) identify all documents known to plaintiffs which relate to each such event.

INTERROGATORY NO. 16 (a). State whether or not any agents, officers, or employees of Magnavox or Sanders have ever consulted or had any kind of discussion with each other or any other company about whether a license would or should not be granted to companies not a party to the consultations or discussions or about the terms, proposed or actual, of any such licenses.

(b). Unless the answer to Interrogatory 16(a) is unequivocally negative, supply the following information about each such event:

- (i) the companies and individuals involved;
- (ii) the date or dates on which each such event occurred and their location;
- (iii) identify all persons known to plaintiffs to have any knowledge of any such event;
- (iv) identify all documents known to plaintiffs which relate to each such event.

INTERROGATORY NO. 17. To the extent it is known to plaintiffs, provide the following information separately for each of the years 1972 to the present, it being understood that plaintiffs may have to rely on information and belief with respect to some of the information sought:

(a) The number of units and the dollar value of these units of video games sold for the home market by each company known by plaintiffs to be in that business and provide the address of each such company.

(b) The number of units sold and the dollar value of those units of video games sold for the coin game market by each company known by plaintiffs to be in that business and provide the address of each such company.

(c) The number of units and the dollar value of those units of video games sold by Magnavox for the home market.

(d) The number of units and the dollar value of those units of video games sold by licensees of plaintiffs, or either of them, for the coin game market identifying each licensee and providing its address.

(e) The number of units and the dollar value of those units of video games sold by licensees of plaintiffs, or either of them, for the home market identifying each licensee and providing its address.

(f) Identify all persons known to plaintiff who have knowledge of the matters inquired about in this Interrogatory.

(g) Identify all documents known to plaintiffs which relate to the matters inquired about in this Interrogatory.

INTERROGATORY NO. 18. To the extent that plaintiffs have not already furnished information to the Seeburg defendants about the following:

(a) Identify all licenses or sublicenses granted under the patents in suit or any other patents owned by either of the plaintiffs which pertain to video games.

(b) Identify all persons known to plaintiffs who have knowledge of such licenses or sublicenses and/or the negotiations leading up to them.

(c) Identify all documents which relate to such licenses or sublicenses.

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